

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SERGIO BONILLA, on behalf of himself and all others similarly situated,)	
)	
)	Case No. 1:21-cv-00051
Plaintiff,)	
)	Hon. Judge Virginia M. Kendall
v.)	
)	Magistrate Judge Gabriel A. Fuentes
PEOPLECONNECT, INC., a Delaware Corporation,)	
)	
)	
Defendant.)	

THERESA LOENDORF, on behalf of herself and all others similarly situated,)	
)	
)	Case No. 1:21-cv-00610
Plaintiff,)	
)	Hon. Judge Virginia M. Kendall
v.)	
)	Magistrate Judge Gabriel A. Fuentes
PEOPLECONNECT, INC., a Delaware Corporation,)	
)	
)	
Defendant.)	

DEFENDANT’S UNOPPOSED MOTION FOR LEAVE TO FILE EXCESS PAGES

Pursuant to Local Rule 7.1, Defendant PeopleConnect, Inc., by and through its undersigned attorneys, respectfully moves for leave to file its Memorandum of Law in Support of its Motion to Dismiss Plaintiffs’ Consolidated Complaint (“Memorandum in Support”) in excess of 15 pages. Defendant’s deadline to answer or otherwise plead is May 10, 2021 and thus Defendant respectfully requests a ruling on this matter as soon as possible. In support of this motion, Defendant states as follows:

1. Despite Defendant’s best efforts, in working carefully to prepare an efficient Memorandum in Support, Defendant requires 20 additional pages to adequately address all issues

presented in Plaintiffs' consolidated complaint. Thus, Defendant moves for leave to file a maximum of 35 pages.¹

2. The Memorandum in Support requires additional pages because it combines several arguments which would each support standalone motions, including arguments which would support dismissal pursuant to Federal Rule of Civil Procedure 12(b)(2), 12(b)(3), and 12(b)(6) and a motion to compel arbitration pursuant a Terms of Use provision.

3. This Court previously granted this motion for Defendant's Motion to Dismiss Plaintiffs' Complaints. Plaintiffs have since filed a consolidated complaint.

4. Defendant has conferred with opposing counsel. Plaintiffs' counsel does not oppose this motion.

WHEREFORE, Defendant respectfully requests that the Court grant this motion and enter an order granting Defendant leave to file a Memorandum in Support not to exceed 35 pages.

¹ Defendant intends to file the Memorandum in Support and related documents separately following this Court's ruling on this Motion.

Dated: May 6, 2021

Respectfully Submitted,

PEOPLECONNECT, INC

By: /s/ Wade A. Thomson

Wade A. Thomson, #6282174
Debbie L. Berman, #6205154
Clifford W. Berlow, #6292383
JENNER & BLOCK LLP
353 N. Clark Street
Chicago, IL 60654-3456
Telephone: 312 222-9350
Facsimile: 312 527-0484
wthomson@jenner.com
dberman@jenner.com
cberlow@jenner.com

Ian Heath Gershengorn (*pro hac vice*)
JENNER & BLOCK LLP
1099 New York Avenue, NW, Suite 900
Washington, DC 20001-4412
Telephone: 202 639-6000
Facsimile: 202 639-6066
igershengorn@jenner.com

Attorneys for Defendant PeopleConnect, Inc.

CERTIFICATE OF SERVICE

I, Wade A. Thomson, certify that on May 6, 2021, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a Notice of Electronic Filing to all counsel of record.

/s/ Wade A. Thomson
Wade A. Thomson